

BOUCHARD MARGULES & FRIEDLANDER

A PROFESSIONAL CORPORATION
SUITE 1400
222 DELAWARE AVENUE
WILMINGTON, DELAWARE 19801
(302) 573-3500
FAX (302) 573-3501

ANDRE G. BOUCHARD
JOEL FRIEDLANDER
DAVID J. MARGULES

November 15, 2006

JOHN M. SEAMAN
DOMINICK T. GATTUSO
JAMES G. McMILLAN, III
SEAN M. BRENNECKE

By E-Filing and Hand Delivery

The Honorable Gregory M. Sleet
United States District Court
844 N. King Street
Lock Box 19
Wilmington, Delaware 19801

Re: *Ronald A. Katz Technology Licensing, L.P. v. American
International Group, Inc. et al.*, D. Del., C.A. No. 06-547

Dear Judge Sleet:

We represent plaintiff Ronald A. Katz Technology Licensing, L.P. ("RAKTL") in the above-referenced action. Enclosed with this letter, please find a stipulation, subject to the Court's approval, for a three-day extension of time to November 20 for plaintiff RAKTL to respond to the counterclaims of defendants CIGNA Corporation, CIGNA Health Corporation, CIGNA HealthCare of Delaware, Inc., Tel-Drug, Inc., and Tel-Drug of Pennsylvania, LLC (collectively, the "CIGNA Defendants").

Each of the 20 defendant groups in this action has filed counterclaims. RAKTL has filed responses to the counterclaims of two defendant groups and is filing replies to seven others today. The counterclaims asserted by the remaining defendants, including the CIGNA Defendants contain lengthy, detailed factual allegations. For example, many of these defendants' counterclaims include almost 200 separate paragraphs, most of which contain multiple allegations. Given the breadth of these counterclaims, RAKTL has requested and the CIGNA Defendants have agreed to grant RAKTL additional time to reply so that RAKTL has sufficient time to be able fully to evaluate the counterclaims and prepare its responses to those allegations. RAKTL has not requested any prior extension of time.

Respectfully submitted,

/s/ John M. Seaman

John M. Seaman (#3868)
[jseaman@bmf-law.com]

The Honorable Gregory M. Sleet
November 15 2006
Page 2

Enclosure

cc: Clerk of Court (by e-filing) (w/attachment)
Collins J. Seitz, Jr., Esquire (by hand and e-mail) (w/attachment)
Andre G. Bouchard, Esquire

{BMF-W0031403.}

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RONALD A. KATZ TECHNOLOGY
LICENSING, L.P.,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP, INC.,
et al.,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

C.A. No. 06-547 (GMS)

STIPULATION AND ORDER TO EXTEND TIME

WHEREAS plaintiff Ronald A. Katz Technology Licensing, L.P. (“RAKTL”) has requested a three-day extension to file its response to the counterclaims filed by CIGNA Corporation, CIGNA Health Corporation, CIGNA HealthCare of Delaware, Inc., Tel-Drug, Inc., and Tel-Drug of Pennsylvania, LLC (collectively, the “CIGNA Defendants”) to allow it the additional time necessary to evaluate more fully the allegations in the counterclaims and its response to the allegations;

WHEREAS the CIGNA Defendants have agreed to the three-day extension requested by RAKTL;

IT IS HEREBY STIPULATED by Plaintiff and the CIGNA Defendants, subject to the approval of the Court, that Plaintiff may have until November 20, 2006 to file its response to the CIGNA Defendants' counterclaims.

BOUCHARD MARGULES & FRIEDLANDER, P.A.

CONNOLLY BOVE LODGE & HUTZ, LLP

/s/ John M. Seaman
Andre G. Bouchard (#2504)
John M. Seaman (#3868)
222 Delaware Ave., Suite 1400
Wilmington, DE 19801
302.573.3500

/s/ Collins J. Seitz, Jr.
Collins J. Seitz, Jr. (#2237)
The Nemours Building
1007 North Orange Street
Wilmington, Delaware
302.658.9141

Attorneys for Plaintiff
Ronald A. Katz Technology Licensing, L.P

Attorneys for Defendants CIGNA
Corporation, CIGNA Health Corporation,
CIGNA HealthCare of Delaware, Ins., Tel-
Drug, Inc., and Tel-Drug of Pennsylvania,
LLC

Dated: November 15, 2006

SO ORDERED this ____ day of November, 2006.

UNITED STATES DISTRICT JUDGE